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By ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: United States v. Linda Sun, a/k/a “Wen Sun,” “Ling Da Sun,” and “Linda Hu,”
and Chris Hu, S4 24 Cr. 346 (BMC) (TAM)**

Your Honor:

We represent Linda Sun in the above-referenced matter and write respectfully on behalf of both defendants. This afternoon, the government filed a fourth superseding indictment. (Dkt. 184 (“S-4”).) It is the fifth indictment filed in this case. (*See* Dkts. 4, 65, 116, 158.) Trial is currently scheduled to begin in 32 days on November 3, 2025.

Ms. Sun respectfully renews her motion to dismiss with respect to the S-4 and Chris Hu again joins that motion as before. (*See* Dkts. 144–46, 160, 179.) For all of the reasons stated therein, relief should be granted. The defendants further request that they be arraigned on the S-4 at the final pretrial conference scheduled for October 20, 2025, which was the date on which the defendants were to be arraigned on the prior superseding indictment.

Respectfully submitted,

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cc: Counsel of Record (via ECF)